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PROPOSED COUNSEL FOR THE DEBTOR IN POSSESSION

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:	§ Chapter 11
	§
1300 CAMPBELL, L.P.,	§ Case No. 09-36300-SGJ-11
	§ Hearing Set:
Debtor.	§ October 13, 2009 at 1:30 p.m.

**WITNESS AND EXHIBIT LIST FOR USE AT HEARING ON MOTION FOR (1)
PRELIMINARY AND CONTINUING AUTHORITY TO USE CASH COLLATERAL, (2)
AUTHORITY TO MAKE ADEQUATE PROTECTION PAYMENTS, (3) SUSPEND
HOLDOVER RENT PROVISIONS UNDER COMMERCIAL LEASE AGREEMENT,
AND (4) FOR RELATED RELIEF**

TO THE HONORABLE STACEY G. C. JERNIGAN, UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, 1300 Campbell, L.P. ("Movant"), and files this Witness and Exhibit List for use at the hearing on Motion for (1) Preliminary and Continuing Authority to Use Cash Collateral, (2) Authority to Make Adequate Protection Payments, (3) Suspend Holdover Rent Provisions Under Commercial Lease Agreement, and (4) for Related Relief and would respectfully show unto the Court as follows:

WITNESSES

Movant may call the following witnesses to testify at the hearing:

1. Steffen E. Waltz

2. Joe W. Milkes

All witnesses designated or called by any other party.

Movant reserves the right to call additional witnesses as may be deemed necessary and appropriate at the hearing.

EXHIBITS

Movant may introduce or request judicial notice of the following exhibits at the hearing:

1. Commercial Lease Agreement dated July 14, 1998
2. Letter of Intent dated August 24, 2009
3. Draft Amendment to Commercial Lease Agreement
4. Profit & Loss - January 2006 through December 2008
5. Profit & Loss - January through August 2009
6. Davis-Dyer-Max, Inc. invoice for insurance renewal
7. Financial Projection - September 2009 through April 2015

All exhibits designated or offered by any other party.

All schedules, pleadings, proofs of claim and matters of record as reflected on the case docket sheet and claims register in this proceeding.

Movant reserves the right to introduce additional exhibits as may be necessary and appropriate at the hearing.

Dated this the 8th day of October, 2009

Respectfully submitted,

GOODRICH POSTNIKOFF &
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Telecopy – 817.335.9411

By: /s/ Joseph F. Postnikoff

Joseph F. Postnikoff
State Bar No. 16168320

PROPOSED COUNSEL FOR DEBTOR IN
POSSESSION

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 8th day of October, 2009, a copy of the foregoing Witness & Exhibit List was served via ECF on the parties registered with the Court to receive ECF and on the following in the manner indicated:

Steffen E. Waltz
Dominion Realty Advisors, Inc.
sewaltz@dominionadvisors.com

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/s/ Joseph F. Postnikoff

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